

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

*David E. Patton*  
Executive Director  
and Attorney-in-Chief

Southern District of New York  
*Jennifer L. Brown*  
Attorney-in-Charge

December 10, 2021

**BY ECF**


Honorable Lewis J. Liman  
United States District Judge  
500 Pearl St.  
New York, NY 10007

Without objection from the Government, bail modified to remove the condition of curfew with electronic monitoring and replace it with strict supervision by pretrial services to include at a minimum telephonic or in-person reporting (at the discretion of pretrial services) at least three times a week.

12/16/2021

**Re: United States v. Jesus Alberto Brito Maldonado  
21 Cr. 167 (LJL)**

SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

Dear Judge Liman:

I write with the consent of Pretrial Services and with no objection from the Government to respectfully request that the Court modify Mr. Brito's pretrial release conditions to remove the condition of curfew with electronic monitoring in order to allow Mr. Brito to continue his current work as a technician and spend time with his infant daughter.

On February 12, 2017, Magistrate Judge Gabriel W. Gorenstein imposed the following bail conditions: a \$50,000 personal recognizance bond cosigned by three financially responsible people; travel limited to SDNY/EDNY; surrender travel documents and no new applications; strict pretrial supervision; drug testing/treatment; home incarceration and electronic monitoring. Mr. Brito was released on February 16, 2021 and has been fully compliant with his bail conditions.

In his current job as a technician, Mr. Brito's ankle monitor has come up as a concern in terms of impact on his interactions with his clients. Additionally, as we approach the holidays, removing curfew would allow Mr. Brito more time and flexibility with his family and baby daughter.

Thank you for your attention to this matter.

Respectfully submitted,  
/s/ Zawadi Baharanyi  
Zawadi Baharanyi, Esq.  
Assistant Federal Defender  
(212) 417-8735

cc: AUSA Jonathan Bodansky (by ECF)  
US PTSO John Moscato (by email)